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8 Attorneys for Plaintiffs
9 Ivera Medical Corporation and
10 Becton, Dickinson and Company

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 IVERA MEDICAL CORPORATION
14 and BECTON, DICKINSON AND
15 COMPANY,

16 Plaintiffs,

17 v.

18 CATHETER CONNECTIONS, INC.,

19 Defendant.

Case No. '14CV1346 GPC BLM

COMPLAINT

JURY TRIAL DEMANDED

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23 Plaintiffs Ivera Medical Corporation (“Ivera”) and Becton, Dickinson and
24 Company (“BD”) (Ivera and BD collectively referred to herein as “Plaintiffs”), for
25 their Complaint against Defendant Catheter Connections, Inc. (“Catheter
26 Connections” or “Defendant”), aver as follows:
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PARTIES

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2 1. Plaintiff Ivera is a California corporation with its principal place of
3 business at 10805 Rancho Bernardo Road, Suite 100, San Diego, CA 92127.

4 2. Plaintiff Becton, Dickinson and Company is a New Jersey corporation
5 with its principal executive offices at 1 Becton Drive, Franklin Lakes, New Jersey,
6 07417.

7 3. Defendant Catheter Connections is a Delaware corporation with its
8 principal place of business at 2455 E. Parleys Way, Suite 150, Salt Lake City, Utah,
9 84109.

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11 **JURISDICTION AND VENUE**

12 4. This is a civil action for patent infringement arising under the patent
13 laws of the United States of America, 35 U.S.C. § 1, et. seq.

14 5. This Court has jurisdiction over the subject matter of the Complaint
15 pursuant to 28 U.S.C. §§1331 & 1338.

16 6. This Court has personal jurisdiction over Catheter Connections because
17 Catheter Connections purposefully ships the infringing products through established
18 distribution channels into the State of California and is engaged in substantial and
19 regular business in the State of California.

20 7. Venue is proper under 28 U.S.C. §§1391(b) and 1400.

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22 **BACKGROUND**

23 8. On June 3, 2014, United States Patent No. 8,740,864 (the “’864
24 patent”), on an invention entitled “Patient Fluid Line Access Valve Antimicrobial
25 Cap/Cleaner” was duly and legally issued by the United States Patent and
26 Trademark Office. A copy of the ’864 patent is attached hereto as Exhibit A.

27 9. BD is and has been the owner of the ’864 patent since its issuance.
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1 G. That this is an exceptional case and for an award of Plaintiffs' attorney
2 fees and costs;

3 H. For such other relief as the Court may deem just and proper.
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5 **DEMAND FOR JURY TRIAL**

6 Plaintiffs hereby demand a jury trial as to all issues that are so triable.
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8 Dated: June 3, 2014

X-PATENTS, APC

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10 By: /s/Jonathan Hangartner

11 JONATHAN HANGARTNER

12 Attorneys for Plaintiffs Ivera Medical
13 Corporation and Becton, Dickinson and
14 Company
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